



TOM REILLY  
ATTORNEY GENERAL

THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL

200 PORTLAND STREET  
BOSTON, MASSACHUSETTS 02114

(617) 727-2200  
<http://www.ago.state.ma.us>

August 4, 2003

Mary L. Cottrell  
Secretary  
Department of Telecommunications and Energy  
100 Cambridge Street, 12th Floor  
Boston, MA 02202

**RE: Berkshire Gas Company, D.T.E. 03-11**

Dear Secretary Cottrell:

Enclosed for filing is the Attorney General's Second Set of Information Requests in the above entitled matter. Thank you.

Sincerely,

Joseph W. Rogers  
Division Chief

Enclosure

cc: James Avery, Esq  
Service List

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

|                              |   |                     |
|------------------------------|---|---------------------|
|                              | ) |                     |
|                              | ) |                     |
| <b>Berkshire Gas Company</b> | ) | <b>D.T.E. 03-11</b> |
|                              | ) |                     |
|                              | ) |                     |

**ATTORNEY GENERAL'S SECOND SET OF  
DOCUMENT AND INFORMATION REQUESTS**

- AG-2-1      Please provide the number of Berkshire Gas Company employees at the end of each month for the years 1997 through 2003 by employee group (e.g. union, clerical, management).
- AG-2-2      Please provide copies of all studies, proposals, memorandum, and plans associated with past, present and future employee reductions that are being or have been considered.
- AG-2-3      Please provide the corporate organization chart for Berkshire Gas Company depicting the Company's operations during 1997. The chart should identify each functional unit and operating division within the Company (line and staff), provide a summary of each unit's functions, and identify the number of management, supervisory and other employee positions budgeted and filled within each unit and division.
- AG-2-4      Please provide the corporate organization chart for Berkshire Gas Company depicting the Company's operations during 2002. The chart should identify each functional unit and operating division within the Company (line and staff), provide a summary of each unit's functions, and identify the number of management, supervisory and other employee positions budgeted and filled within each unit and division.
- AG-2-5      Please state the number of part-time employees (union and non-union) at the end of each month during 2002.
- AG-2-6      On Page III-13 of the Company's filing it states that "[c]onsistent with the Department's February 6, 2003 instructions in D.T.E. 99-84, the Company developed the mean staffing levels consistent with the requirements of G.L. c. 164, § 1E." Please provide all workpapers, calculations, assumptions and basis for assumptions for the mean staffing levels.

- AG-2-7      Please provide copies of the relevant sections of the collective bargaining agreements which provide for reductions in staff for union employees referred to on Page III-13 of the Companies filing.
- AG-2-8      The Company's 1997 Annual Return to the Department, page 47, line 46, indicates that the Company had 153 total employees (17 -Propane, 136-utility). Please explain how the 2002 employee staffing level of 128 employees is consistent with the requirements of G.L. c. 164, § 1E. Please provide copies of the relevant sections of the collective bargaining agreements which provide for reductions in staff for union employees.

Dated: August 4, 2003